

512-07/JJW  
FREEHILL HOGAN & MAHAR, LLP  
Attorneys for Defendant  
MAERSK LINE LIMITED  
80 Pine Street  
New York, New York 10005  
(212) 425-1900

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
JOHN PADILLA,

Case No.: 1:07-cv-03638-PKL

Plaintiff,

- against -

MAERSK LINE, LTD. and/or  
UNITED STATES,

Defendant.  
-----X

**DEFENDANT'S RESPONSE TO PLAINTIFF'S INTERROGATORY**


NOW COMES Defendant, by and through counsel undersigned, and herewith responds to the following Interrogatory:

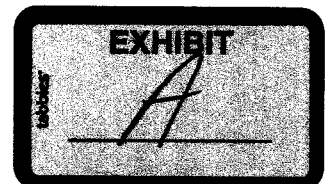
1. State the amount of wages paid Plaintiff's replacement man during Plaintiff's period of unfitness for duty, including but not limited to, itemized dates of payment of regular pay, and overtime pay.

**Response:** See wages of Mr. Jose Manandic which are attached hereto as Exhibit "A".

FREEHILL HOGAN & MAHAR, LLP  
Attorneys for Defendant Maersk Line, Ltd.

BY:

  
John J. Walsh (JW 9349)  
Daniel J. Fitzgerald (DF 6313)  
80 Pine Street  
New York, New York 10005  
(212) 425-1900



TO: Dennis M. O'Bryan, Esq.  
Attorney for Plaintiff John Padilla  
401 S. Old Woodward  
Suite 450  
Birmingham, MI 48009  
(248) 258-6262

**Final Payroll Voucher -- Maersk Line, Limited**  
**MV Maersk Arkansas Voyage 24**  
**Article 310: Manandic, Jose F (311-Chief Cook)**  
 SS#576-46-5957, 123 E 15th Street, New York, NY 10003 USA

**Regular Wages (11/13/2006 thru 11/30/2006):**

Code	Description	From Date	To Date	#Days	MthlyRate	DayRate	Total
01R	Base Wages	11/13/2006	11/30/2006	18	3051.76	101.73	1,831.14
Total.....							1,831.14

**Overtime Wages:**

Description	Total
Total Earned in 109.0 Hours .....	2,295.54

**Adjustments:**

Code	Description	Date	#Units	Rate/Unit	Taxable?	Total
15A	Travel Allowance	11/13/2006	2.000	101.730	Yes	203.46
Total.....						203.46

**Deductions:**

Code	Description	Date	#Units	Rate/Unit	Total
52D	Slop Chest	11/26/2006	1.000	6.000	6.00
Total.....					6.00

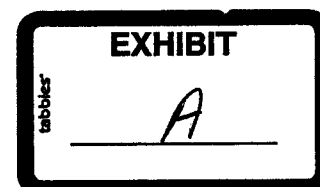
**Summary and Totals:**

Year-To-Date Totals	Amount	This Voucher (TaxStat=S-1)	Amount
Taxable Gross.....	4,330.14	Taxable Gross.....	4,330.14
Gross Earnings.....	4,330.14	Gross Earnings.....	4,330.14
Fed Inc Tax... (Wages of \$4,330.14).....	749.88	Fed Inc Tax... (Wages of \$4,330.14).....	749.88
Soc Sec Tax... (Wages of \$4,330.14).....	268.47	Soc Sec Tax... (Wages of \$4,330.14).....	268.47
Medicare Tax... (Wages of \$4,330.14).....	62.79	Medicare Tax... (Wages of \$4,330.14).....	62.79
		Deductions.....	6.00
		Net Amount Due.....	3,243.00

**Payment Method:**

Cash.....	500.00
Office Check to Manandic, Jose F (ACHS).....	2,743.00

Date \_\_\_\_\_ Seaman's Signature \_\_\_\_\_ Master's Signature \_\_\_\_\_



**Final Payroll Voucher -- Maersk Line, Limited**  
**MV Maersk Arkansas Voyage 25**  
**Article 310: Manandic, Jose F (311-Chief Cook)**  
 SS#576-46-5957, 123 E 15th Street, New York, NY 10003 USA

**Regular Wages (12/01/2006 thru 12/31/2006):**

Code	Description	From Date	To Date	#Days	MthlyRate	DayRate	Total
01R	Base Wages	12/01/2006	12/31/2006	31	3051.76	101.73	3,153.63
Total .....							3,153.63

**Overtime Wages:**

Description	Total
Total Earned in 221.0 Hours .....	4,654.26

**Adjustments:**

Code	Description	Date	#Units	Rate/Unit	Taxable?	Total
25	Passenger Meal Compensation	12/05/2006	1.000	40.000	Yes	40.00
Total .....						40.00

**Deductions:**

Code	Description	Date	#Units	Rate/Unit	Total
52D	Slop Chest	12/17/2006	1.000	30.000	30.00
52D	Slop Chest	12/26/2006	1.000	21.000	21.00
Total .....					51.00

**Summary and Totals:**

Year-To-Date Totals	Amount	This Voucher (TaxStat=S-1)	Amount
Taxable Gross .....	12,178.03	Taxable Gross .....	7,847.89
Gross Earnings .....	12,178.03	Gross Earnings .....	7,847.89
Fed Inc Tax ... (Wages of \$12,178.03) .....	2,138.41	Fed Inc Tax ... (Wages of \$7,847.89) .....	1,388.53
Soc Sec Tax ... (Wages of \$12,178.03) .....	755.04	Soc Sec Tax ... (Wages of \$7,847.89) .....	486.57
Medicare Tax ... (Wages of \$12,178.03) .....	176.58	Medicare Tax ... (Wages of \$7,847.89) .....	113.79
		Allotments .....	1,500.00
		Advances .....	500.00
		Deductions .....	51.00
		Net Amount Due .....	3,808.00

**Payment Method:**

Cash .....	600.00
Office Check to Manandic, Jose F (ACHS) .....	3,208.00

Date

Seaman's Signature

Master's Signature

**Final Payroll Voucher -- Maersk Line, Limited**  
**MV Maersk Arkansas Voyage 26**  
**Article 310: Manandic, Jose F (311-Chief Cook)**  
 SS#576-46-5957, 123 E 15th Street, New York, NY 10003 USA

**Regular Wages (01/01/2007 thru 01/31/2007):**

Code	Description	From Date	To Date	#Days	MthlyRate	DayRate	Total
01R	Base Wages	01/01/2007	01/31/2007	31	3051.76	101.73	3,153.63
Total .....							3,153.63

**Overtime Wages:**

Description	Total
Total Earned in 221.0 Hours .....	4,654.26

**Deductions:**

Code	Description	Date	#Units	Rate/Unit	Total
52D	Slop Chest	01/08/2007	1.000	8.000	8.00
52D	Slop Chest	01/17/2007	1.000	5.000	5.00
52D	Slop Chest	01/24/2007	1.000	5.000	5.00
Total .....					18.00

**Summary and Totals:**

Year-To-Date Totals	Amount	This Voucher (TaxStat=S-1)	Amount
Taxable Gross .....	7,807.89	Taxable Gross .....	7,807.89
Gross Earnings .....	7,807.89	Gross Earnings .....	7,807.89
Fed Inc Tax ... (Wages of \$7,807.89) .....	1,359.59	Fed Inc Tax ... (Wages of \$7,807.89) .....	1,359.59
Soc Sec Tax ... (Wages of \$7,807.89) .....	484.09	Soc Sec Tax ... (Wages of \$7,807.89) .....	484.09
Medicare Tax ... (Wages of \$7,807.89) .....	113.21	Medicare Tax ... (Wages of \$7,807.89) .....	113.21
		Allotments .....	1,500.00
		Deductions .....	18.00
		Net Amount Due .....	4,333.00

**Payment Method:**

Office Check to Manandic, Jose F (ACHS) .....	4,333.00
-----------------------------------------------	----------

Date

Seaman's Signature

Master's Signature

**Final Payroll Voucher -- Maersk Line, Limited**  
**MV Maersk Arkansas Voyage 27**  
**Article 310: Manandic, Jose F (311-Chief Cook)**  
SS#576-46-5957, 123 E 15th Street, New York, NY 10003 USA

**Regular Wages (02/01/2007 thru 02/28/2007):**

Code	Description	From Date	To Date	#Days	MthlyRate	DayRate	Total
01R	Base Wages	02/01/2007	02/28/2007	28	3051.76	101.73	2,848.44
Total.....							2,848.44

**Overtime Wages:**

Description	Total
Total Earned in 167.0 Hours .....	3,499.46

**Deductions:**

Code	Description	Date	#Units	Rate/Unit	Total
52D	Slop Chest	02/15/2007	1.000	16.000	16.00
52D	Slop Chest	02/26/2007	1.000	5.000	5.00
Total.....					21.00

**Summary and Totals:**

Year-To-Date Totals	Amount	This Voucher (TaxStat=S-1)	Amount
Taxable Gross .....	14,155.79	Taxable Gross .....	6,347.90
Gross Earnings .....	14,155.79	Gross Earnings .....	6,347.90
Fed Inc Tax ... (Wages of \$14,155.79) .....	2,411.87	Fed Inc Tax ... (Wages of \$6,347.90) .....	1,052.28
Soc Sec Tax ... (Wages of \$14,155.79) .....	877.66	Soc Sec Tax ... (Wages of \$6,347.90) .....	393.57
Medicare Tax ... (Wages of \$14,155.79) .....	205.26	Medicare Tax ... (Wages of \$6,347.90) .....	92.05
		Allotments .....	1,500.00
		Advances .....	1,000.00
		Deductions .....	21.00
		Net Amount Due .....	2,289.00

**Payment Method:**

Office Check to Manandic, Jose F (ACHS) .....	2,289.00
-----------------------------------------------	----------

Date

Seaman's Signature

Master's Signature